

EXHIBIT A

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 8 **IN THE UNITED STATES DISTRICT COURT**
 9 **FOR THE DISTRICT OF ARIZONA**

10 IN RE BARD IVC FILTERS 11 PRODUCTS LIABILITY LITIGATION 12 13 14 15	No. MD-15-02641-PHX-DGC Case No. CV-16-00008-PHX-DGC AMENDED MASTER SHORT FORM COMPLAINT FOR DAMAGES FOR INDIVIDUAL CLAIMS
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16 Plaintiff named below, for his Amended Complaint against Defendants named
 17 below, incorporates the Master Complaint for Damages in MDL 2641 by reference (Doc.
 18 364).
 19

20 Plaintiff further shows the Court as follows:

21 1. Plaintiff/Deceased Party: Robert G. Harbridge

22 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
 23 consortium claim: N/A
 24

25 3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,
 26 conservator): N/A
 27
 28

1 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence
2 at the time of implant: Virginia

3 5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence
4 at the time of injury: Virginia

6 6. Plaintiff's current state(s) [if more than one Plaintiff] of residence: Virginia

7 7. District Court and Division in which venue would be proper absent direct
8 filing: United States District Court for the Western District of Virginia –
9 Lynchburg Division

10 8. Defendants (check Defendants against whom Complaint is made):

11 ☒ C.R. Bard Inc.

12 ☒ Bard Peripheral Vascular, Inc.

13 9. Basis of Jurisdiction:

14 ☒ Diversity of Citizenship

15 ☐ Other:

16 ☐ Other allegations of jurisdiction and venue not expressed in Master
17 Complaint: N/A

18 10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making
19 a claim (Check applicable Inferior Vena Cava Filter(s)):

20 ☐ Recovery® Vena Cava Filter

21 ☐ G2® Vena Cava Filter

22 ☐ G2® Express (G2®X) Vena Cava Filter

☐ Eclipse® Vena Cava Filter

☐ Meridian® Vena Cava Filter

☒ Denali® Vena Cava Filter

☐ Other:

11. Date of Implantation as to each product: January 9, 2014

12. Counts in the Master Complaint brought by Plaintiff(s):

☒ Count I: Strict Products Liability - Manufacturing Defect

☒ Count II: Strict Products Liability - Information Defect (Failure to Warn)

☒ Count III: Strict Products Liability- Design Defect

☒ Count IV: Negligence – Design

☒ Count V: Negligence- Manufacture

☒ Count VI: Negligence- Failure to Recall/Retrofit

☒ Count VII: Negligence- Failure to Warn

☒ Count VIII: Negligent Misrepresentation

☒ Count IX: Negligence Per Se

☒ Count X: Breach of Express Warranty

☒ Count XI: Breach of Implied Warranty

☒ Count XII: Fraudulent Misrepresentation

☒ Count XIII: Fraudulent Concealment

☒ Count XIV: Violations of Applicable New York Law Prohibiting

Consumer Fraud and Unfair and Deceptive Trade Practices

☐ Count XV: Loss of Consortium

☐ Count XVI: Wrongful Death

DATED this 17th day of March, 2016.

MILLER WEISBROD LLP

/s/Les Weisbrod
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2016, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel of record.

/s/Les Weisbrod
Les Weisbrod